

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Stephen L. Dickson	:	
Debtor	:	Chapter 13
	:	
JPMorgan Chase Bank, National Association	:	Case No. 1:13-bk-02665
Movant	:	
v.	:	Answer to Motion for Relief
Stephen L. Dickson,	:	from Stay
Charles J. DeHart, III, Trustee	:	
Respondents	:	

RESPONDENT'S REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 16th day of September, 2016, comes the respondent, Stephen L. Dickson, by and through counsel, the CGA Law Firm, Lawrence V. Young, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. The averments of paragraph 5 are unknown to the Debtor, and proof at any hearing is demanded.
6. The averments of paragraph 6 constitute a conclusion of law to which no responsive pleading is required.
7. It is admitted that the Debtor has failed to make certain post-petition mortgage payments because of some financial difficulties. However, the Debtor has already started to cure those arrears and should be able to have all of them cured by the end of October, 2016.

8. The averments of Paragraph 8 are self-serving and assert present facts to which the Respondents are not privy.

9. The Chapter 13 records speak for itself.

10. That filing fees were incurred was admitted. The preparation of a two page motion has caused JP Morgan Chase Bank to incur \$650.00 Dollars of legal fees is denied without some more specific assertion as to the time incurred and the cost associated with the Lawyers and non- Lawyers staff members working on this file.

11. The averments of paragraph 11 constitute a conclusion of law to which no responsive pleading is required.

WHEREFORE, it is requested that the Automatic Stay not be terminated but that the Debtor given a reasonable opportunity to cure the post-petition arrears.

Respectfully submitted,

CGA Law Firm, PC

/s/ Lawrence V. Young
Lawrence V. Young, Esq.
Sup. Ct. I.D. No. 21009
135 North George Street
York, PA 17401
(717) 718-7110
Counsel for Debtor

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CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2016, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Charles J. DeHart, III, Esquire (Trustee)
ECF

Joshua I. Goldman, Esq.
KML Law Group, P.C.
701 Market Street
Suite 5000
Philadelphia, PA 19106-1532

/s/ Lawrence V. Young
Lawrence V. Young, Esquire